

REMARKS

Maintenance of the Section 102 rejection based on Brown should be reconsidered. The cited reference does not teach the claim element of providing a cleaning solution through at least one of said brushes. Not only is this element not inherent, it is impossible in the cited reference. The cited reference shows a PVA brush which is effectively a solid plastic brush. (See the material from the Internet submitted on June 30, 2006 which shows a PVA brush and, in the original Internet picture, one can clearly see it is a nylon-like plastic material). There is no way that a fluid could have been sprayed through the plastic material making up the brush.

The new assertion in the latest rejection that Figure 4 shows holes should be reconsidered. There are no holes shown in Figure 4. While the office action does not indicate what the are the alleged holes, the circles shown are clearly nubs, not holes. There simply are no holes.

Thus, the Section 102 rejection, based on Brown, should be reconsidered.

The alternative Section 103 rejection, based on the combination of Brown in view of Mikhaylichenko, fails to meet claim 1 as amended.

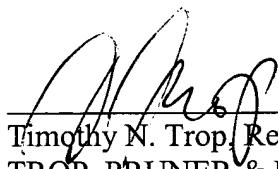
The claim now calls for providing a cleaning solution including a chemical and deionized water through at least one of the brushes and providing only deionized water at the interface between the brushes. As explained in the present specification, the use of different materials applied through the brushes and sprayed results in the cleaning solution being more effectively dispensed at the brush wafer interface, reducing overspray of chemical and waste of chemical, while providing more effective cleaning and improving the lifetime of the brushes themselves. This may result not only in more effective cleaning, but also reduced wafer contamination. See the specification at page 3, line 24 through page 4, line 10.

The cited references are unspecific about what is provided through one or the other of the medium. Nothing in either reference teaches using the different solutions claimed in the way claimed. Namely, nothing teaches spraying only deionized water while providing a cleaning solution including a chemical and deionized water through the brush.

Therefore, as amended, the application now patentably distinguishes over the references.

Respectfully submitted,

Date: October 25, 2006



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